

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

LeClairRyan, PLLC,¹

Debtor

Case No.

19-34574-KRH

Chapter

7

**PROPOSED AMENDED AGENDA FOR HEARING ON
OCTOBER 24, 2019, AT 1:00 P.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on October 24, 2019, beginning at 1:00 p.m.

I. ADJOURNED MATTERS OF THE DEBTOR

1. “Cash Management”–Motion of LeClairRyan PLLC for Entry of an Order (I) Authorizing the Debtor to Maintain Existing Bank Accounts and Business Forms and Continue to Use Existing Cash Management System and (II) Waiving the Requirements of Section 345(b) of the Bankruptcy Code [ECF No. 7]

Related Documents:

- a. Interim Order (I) Authorizing Debtor to Maintain Existing Bank Accounts and Business Forms and Continue to Use Existing Cash Management System and (II) Waiving the Requirements of Section 345(b) of the Bankruptcy Code [ECF No. 40]
- b. Notice of Motion and Notice of Hearing (Notice of Filing of Chapter 11 Petition, First Day Motions, and Proposed Hearing on First Day Motions) (Re: related

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

Paula S. Beran, Esquire (Va. Bar No. 34679)
David N. Tabakin, Esquire (Va. Bar No. 82709)
Tavener & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
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Counsel for Lynn L. Tavener, Chapter 7 Trustee

document(s) 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/3/2019 at 01:00 PM at Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia. (Brown, Tyler) [ECF No. 16]

- c. Hearing held before Hon. Keith L. Phillips; Motion GRANTED on Interim Basis, Final Hearing Set (Re: related document(s) 7 Motion to Approve filed by LeClairRyan PLLC) Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Toby Long for Debtor; Robert B. Van Arsdale for the Office of the U.S. Trustee. (Oliver, Betty) [ECF No. 26]
- d. Interim Order (I) Authorizing Debtor to Maintain Existing Bank Accounts and Business Forms and Continue to Use Existing Cash Management System and (II) Waiving the Requirements of Section 345(b) of the Bankruptcy Code. Order setting Hearing (Re: related document(s) 7 Motion to Approve filed by LeClairRyan PLLC) Final Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Ramirez-Lowe, Suzan) [ECF No. 40]
- e. Certificate of Service (Re: related document(s) 1 Chapter 11 Voluntary Petition filed by LeClairRyan PLLC, 3 Declaration filed by LeClairRyan PLLC, 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 14 Declaration filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC, 16 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC, 17 Statement filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 44]
- f. Affidavit of Service (Re: related document(s) 35 Order on Motion to Extend Time to File Lists Schedules and/or Statements LBR 1007-1, 36 Order on Motion to Expedite Hearing, 37 Order on Motion to Approve, 38 Order on Motion to

Approve, 40 Order Continuing/Rescheduling/Setting Hearing, 41 Order Continuing/Rescheduling/Setting Hearing, 42 Order on Motion to File Document(s) Under Seal, 43 Order Continuing/Rescheduling/Setting Hearing, 48 Order of Designation, 51 Order Continuing/Rescheduling/Setting Hearing, 52 Order Directing) filed by Jennifer Ellen Wuebker of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Wuebker, Jennifer) [ECF No. 73]

- g. Final Hearing continued; (Re: related document(s) 7 Motion to Approve filed by LeClairRyan PLLC) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown. (Oliver, Betty) [ECF No. 111]

Response Deadline: October 17, 2019

Responses Filed: None

Status: The Trustee will request that interim relief be continued and that a final hearing be set for November 21, 2019 at 1:00 p.m.

- 2. "Receivables Motion"— Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Approving Settlement Procedures for Compromising Accounts Receivable and Related Relief [ECF No. 8]

Related Documents:

- a. Motion to File Document(s) Under Seal (Motion of LeClairRyan PLLC Pursuant to Sections 105 and 107 of the Bankruptcy Code and Bankruptcy Rule 9018 for Entry of an Order Authorizing LeClairRyan PLLC to File Under Seal Exhibit B to the Motion to LeClairRyan PLLC for Entry of Interim and Final Orders Approving Settlement Procedures and Compromising Accounts Receivable and Related Relief) (Related Document(s) 8 Motion to Approve filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Brown, Tyler) [ECF No. 9]
- b. Sealed Exhibit [ECF No. 10]
- c. Notice of Motion and Notice of Hearing (Notice of Filing of Chapter 11 Petition, First Day Motions, and Proposed Hearing on First Day Motions) (Re: related document(s) 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan

PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/3/2019 at 01:00 PM at Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia. (Brown, Tyler) [ECF No. 16]

- d. Hearing held before Hon. Keith L. Phillips; Motion GRANTED (Re: related document(s) 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC) Appearance: Jason Harbour for Debtor. (Oliver, Betty) [ECF No. 29]
- e. Hearing held before Hon. Keith L. Phillips; Motion GRANTED on Interim Basis as set out in open court, Final Hearing Set (Re: related document(s) 8 Motion to Approve filed by LeClairRyan PLLC) Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Jason Harbour for Debtor; Douglas Foley for ABL Alliance, LLLP; Robert Van Arsdale for Office of the U.S. Trustee. (Oliver, Betty) [ECF No. 30]
- f. Order Authorizing LeClairRyan PLLC to File Under Seal Exhibit B to the Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Approving Settlement Procedures for Compromising Accounts Receivable and Related Relief [ECF No. 42]
- g. Certificate of Service (Re: related document(s) 1 Chapter 11 Voluntary Petition filed by LeClairRyan PLLC, 3 Declaration filed by LeClairRyan PLLC, 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 14 Declaration filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC, 16 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC, 17 Statement filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 44]
- h. Interim Order Approving Settlement Procedures for Compromising Accounts Receivable and Related Relief, and Scheduling a Final Hearing [ECF No. 51]
- i. Affidavit of Service (Re: related document(s) 35 Order on Motion to Extend Time to File Lists Schedules and/or Statements LBR 1007-1, 36 Order on Motion to Expedite Hearing, 37 Order on Motion to Approve, 38 Order on Motion to Approve, 40 Order Continuing/Rescheduling/Setting Hearing, 41 Order Continuing/Rescheduling/Setting Hearing, 42 Order on Motion to File

Document(s) Under Seal, 43 Order Continuing/Rescheduling/Setting Hearing, 48 Order of Designation, 51 Order Continuing/Rescheduling/Setting Hearing, 52 Order Directing) filed by Jennifer Ellen Wuebker of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Wuebker, Jennifer) [ECF No. 73]

- j. Final Hearing continued; (Re: related document(s) 8 Motion to Approve filed by LeClairRyan PLLC) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown. (Oliver, Betty) [ECF No. 112]

Response Deadline: October 17, 2019

Responses Filed: None

Status:

The Trustee will request that a final order be entered granting the Motion as modified, with the modifications being that (a) the Chapter 7 Trustee shall replace the role of the "Debtor," (b) consent from the Office of the United States Trustee is no longer required given the conversion to Chapter 7; and (c) Lender's consent shall not be required upon (i) full payment of its secured indebtedness and (ii) Lender's written acknowledgement to the same.

- 3. "Wages Motion"— Motion of LeClairRyan PLLC for Entry of Interim and Final Orders (I) Authorizing Debtor to Pay Prepetition Wages and Salaries; and (II) Directing Applicable Financial Institutions to Honor and Process Related Checks and Transfers [ECF No. 11]

Related Documents:

- a. Notice of Motion and Notice of Hearing (Notice of Filing of Chapter 11 Petition, First Day Motions, and Proposed Hearing on First Day Motions) (Re: related document(s) 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/3/2019 at 01:00 PM at Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia. (Brown, Tyler) [ECF No. 16]
- b. Hearing held before Hon. Keith L. Phillips; Motion GRANTED on Interim Basis as set out in open court, Final Hearing Set (Re: related document(s) 11 Motion to

Approve filed by LeClairRyan PLLC) Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown for Debtor. (Oliver, Betty) [ECF No. 31]

- c. Interim Order (I) Authorizing LeClairRyan PLLC to Pay Prepetition Wages and Salaries; (II) Directing Applicable Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief [ECF No. 43]
- d. Certificate of Service (Re: related document(s) 1 Chapter 11 Voluntary Petition filed by LeClairRyan PLLC, 3 Declaration filed by LeClairRyan PLLC, 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 14 Declaration filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC, 16 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC, 17 Statement filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 44]
- e. Affidavit of Service (Re: related document(s) 35 Order on Motion to Extend Time to File Lists Schedules and/or Statements LBR 1007-1, 36 Order on Motion to Expedite Hearing, 37 Order on Motion to Approve, 38 Order on Motion to Approve, 40 Order Continuing/Rescheduling/Setting Hearing, 41 Order Continuing/Rescheduling/Setting Hearing, 42 Order on Motion to File Document(s) Under Seal, 43 Order Continuing/Rescheduling/Setting Hearing, 48 Order of Designation, 51 Order Continuing/Rescheduling/Setting Hearing, 52 Order Directing) filed by Jennifer Ellen Wuebker of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Wuebker, Jennifer) [ECF No. 73]
- f. Final Hearing continued; (Re: related document(s) 11 Motion to Approve filed by LeClairRyan PLLC) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown. (Oliver, Betty) [ECF No. 113]

Response Deadline: October 17, 2019

Responses Filed: None

Status: The Trustee will request that the Motion be granted on a final basis, with the clarification that certain relief is extended to the Trustee on behalf of the Estate.

4. “Assumption Motion”– Omnibus Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Assume Certain Executory Contracts [ECF No. 12]

Related Documents:

- a. Notice of Motion and Notice of Hearing (Notice of Filing of Chapter 11 Petition, First Day Motions, and Proposed Hearing on First Day Motions) (Re: related document(s) 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/3/2019 at 01:00 PM at Judge Phillips’ Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia. (Brown, Tyler) [ECF No. 16]
- b. Hearing held before Hon. Keith L. Phillips; Motion GRANTED on Interim Basis, Final Hearing Set (Re: related document(s) 12 Motion to Assume filed by LeClairRyan PLLC) Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens’ Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown for Debtor. (Oliver, Betty) [ECF No. 28]
- c. Certificate of Service (Re: related document(s) 1 Chapter 11 Voluntary Petition filed by LeClairRyan PLLC, 3 Declaration filed by LeClairRyan PLLC, 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 14 Declaration filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC, 16 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC, 17 Statement filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 44]
- d. Interim Order Authorizing the Debtor to Assume Certain Executory Contracts (Re: related document(s) 12 Motion to Assume filed by LeClairRyan PLLC) (Ramirez-Lowe, Suzan) [ECF No. 52]

- e. Affidavit of Service (Re: related document(s) 35 Order on Motion to Extend Time to File Lists Schedules and/or Statements LBR 1007-1, 36 Order on Motion to Expedite Hearing, 37 Order on Motion to Approve, 38 Order on Motion to Approve, 40 Order Continuing/Rescheduling/Setting Hearing, 41 Order Continuing/Rescheduling/Setting Hearing, 42 Order on Motion to File Document(s) Under Seal, 43 Order Continuing/Rescheduling/Setting Hearing, 48 Order of Designation, 51 Order Continuing/Rescheduling/Setting Hearing, 52 Order Directing) filed by Jennifer Ellen Wuebker of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Wuebker, Jennifer) [ECF No. 73]
- f. Final Hearing continued; (Re: related document(s) 12 Motion to Assume filed by LeClairRyan PLLC) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Tyler Brown (Oliver, Betty) [ECF No. 114]

Response Deadline: October 17, 2019

Responses Filed: Objection of Super-Server, LLC to Motion by Debtor to Assume Executory Contracts [ECF No. 88]

Status: The Trustee will request that the Motion be withdrawn as it relates to the contracts of Lori D. Thompson, Esq. and Christopher J. Lange, Esq. With respect to the contract of On-Site Associates, LLC, the Trustee will request that the Motion be granted on a final basis.

- 5. Motion to Authorize (Motion for Entry of an Order Authorizing and Directing Payment of Client Expense Reimbursements) filed by Jason William Harbour of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Harbour, Jason) [ECF No. 71]

Related Documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) 66 Application to Employ filed by LeClairRyan PLLC, 67 Application to Employ filed by LeClairRyan PLLC, 68 Motion to Appoint filed by LeClairRyan PLLC, 69 Motion to Reject filed by LeClairRyan PLLC, 70 Motion to Approve filed by LeClairRyan PLLC, 71 Motion to Authorize filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Long, Henry) [ECF No. 72]
- b. Affidavit of Service (Re: related document(s) 66 Application to Employ filed by LeClairRyan PLLC, 67 Application to Employ filed by LeClairRyan PLLC, 68

Motion to Appoint filed by LeClairRyan PLLC, 69 Motion to Reject filed by LeClairRyan PLLC, 70 Motion to Approve filed by LeClairRyan PLLC, 71 Motion to Authorize filed by LeClairRyan PLLC, 72 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC) filed by Jennifer Ellen Wuebker of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Wuebker, Jennifer) [ECF No. 75]

- c. Statement (Notice of Revised Proposed Orders) (Re: related document(s) 18 Motion to Reject filed by LeClairRyan PLLC, 66 Application to Employ filed by LeClairRyan PLLC, 67 Application to Employ filed by LeClairRyan PLLC, 68 Motion to Appoint filed by LeClairRyan PLLC, 70 Motion to Approve filed by LeClairRyan PLLC, 71 Motion to Authorize filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 102]
- d. Hearing continued; (Re: related document(s) 71 Motion to Authorize filed by LeClairRyan PLLC) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearance: Jason Harbour. (Oliver, Betty) [ECF No. 121]

Response Deadline: October 17, 2019

Responses Filed: Limited Objection of ABL Alliance, LLLP to Motion for Entry of an Order Authorizing and Directing Payment of Client Expense Reimbursements [ECF No. 100]

Status: This Trustee will request that the hearing on the Motion be continued to November 21, 2019 at 1:00 p.m.

- 6. Motion to Approve Use of Cash Collateral (Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection and Related Relief) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Brown, Tyler) [ECF No. 13]

Related Documents:

- a. Declaration (Declaration of Guy A. Davis in Support of Motion of LeClairRyan PLLC for Entry of Interim and Final Orders Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection and Related Relief) (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Brown, Tyler) [ECF No. 14]

- b. Notice of Motion and Notice of Hearing (Notice of Filing of Chapter 11 Petition, First Day Motions, and Proposed Hearing on First Day Motions) (Re: related document(s) 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC) filed by Tyler P. Brown of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. Hearing scheduled for 9/3/2019 at 01:00 PM at Judge Phillips' Courtroom, 701 E. Broad St., Rm. 5100, Richmond, Virginia. (Brown, Tyler) [ECF No. 16]
- c. Hearing held before Hon. Keith L. Phillips; Motion GRANTED on Interim Basis, Final Hearing Set. Declaration of Guy A. Davis #14 ADMITTED (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC) Hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Appearances: Jason Harbour for Debtor; Douglas Foley for ABL Alliance LLLP. (Oliver, Betty) [ECF No. 32]
- d. Interim Order Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection and Related Relief. (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC) Final hearing scheduled for 9/26/2019 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Ramirez-Lowe, Suzan) [ECF No. 41]
- e. Certificate of Service (Re: related document(s) 1 Chapter 11 Voluntary Petition filed by LeClairRyan PLLC, 3 Declaration filed by LeClairRyan PLLC, 4 Motion to Approve filed by LeClairRyan PLLC, 5 Motion to Extend Time to File Lists, Schedules and/or Statements filed by LeClairRyan PLLC, 6 Motion to Approve filed by LeClairRyan PLLC, 7 Motion to Approve filed by LeClairRyan PLLC, 8 Motion to Approve filed by LeClairRyan PLLC, 9 Motion to File Documents(s) Under Seal filed by LeClairRyan PLLC, 11 Motion to Approve filed by LeClairRyan PLLC, 12 Motion to Assume filed by LeClairRyan PLLC, 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 14 Declaration filed by LeClairRyan PLLC, 15 Motion to Expedite Hearing filed by LeClairRyan PLLC, 16 Notice of Motion and Notice of Hearing filed by LeClairRyan PLLC, 17 Statement filed by LeClairRyan PLLC) filed by Henry Pollard Long III of Hunton Andrews Kurth LLP on behalf of LeClairRyan PLLC. (Long, Henry) [ECF No. 44]
- f. Declaration of John McCauley (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC, 41 Order

Continuing/Rescheduling/Setting Hearing) filed by Douglas M. Foley of McGuireWoods LLP on behalf of ABL Alliance, LLLP. (Attachments: # 1 Exhibit(s) A # 2 Exhibit(s) B) (Foley, Douglas) [ECF No. 110]

- g. Hearing held; Motion GRANTED on Interim Basis with terms as set out in open court (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC) Appearances: Tyler Brown; Douglas Foley; Joseph Liberatore; Alexander Green. (Oliver, Betty) [ECF No. 122]

Response Deadline: October 17, 2019

Objection to Motion to Use Cash Collateral (Re: related document(s) 13 Motion to Approve Use of Cash Collateral filed by LeClairRyan PLLC) filed by Karen M. Crowley of Crowley Liberatore P.C. on behalf of Super-Server, LLC. (Attachments: # 1 Service List) (Crowley, Karen) [ECF No. 89]

Responses Filed:

Motion for Joinder with Super-Servicer LLC's Objection to Debtor's Motion to Use Cash Collateral (Related Document(s) 89 Objection to Motion/Application filed by Super-Server, LLC) filed by Alexander Richard Green of Beiramee Law Group P.C. on behalf of iManage, LLC. (Attachments: # 1 Certificate of Service with Service List) (Green, Alexander) [ECF No. 98]

Status:

This matter is moot given the (a) conversion to Chapter 7 and (b) Trustee's filing of an additional motion regarding the use of cash collateral. As such, the Motion may be withdrawn from the Court's docket.

II. UNCONTESTED MATTERS OF THE TRUSTEE

- 7. Trustee's Motion to Authorize (Motion for Immediate Authority to Operate Certain Aspects of Debtor's Business for a Limited Period and to Shorten Notice Thereof, and Memorandum in Support Thereof) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 144]

Related Documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) 143 Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner, 144 Motion to Authorize filed by Lynn L. Tavenner, 145 Motion to Expedite Hearing filed by

Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 10/4/2019 at 01:30 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 146]

- b. Hearing held and continued; Motion Granted on Interim Basis; Order to be submitted (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Appearances: Paula Beran, Douglas Foley; Robert Van Arsdale. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Oliver, Betty) [ECF No. 149]
- c. Interim Order Authorizing Trustee to Operate Certain Aspects of Debtor's Business for a Limited Period. (Re: related document(s) 144 Motion to Authorize filed by Lynn L. Tavenner) Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Bullock, Nathaniel) [ECF No. 155]
- d. Supplemental Motion to Authorize (Trustee's Supplement to Her Motion for Authority to Operate Certain Aspects of the Debtor's Business for a Limited Period and Memorandum in Support Thereof) (Related Document(s) [144] Motion to Authorize filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 165]

Response Deadline: October 21, 2019

Responses Filed: None.

Status: The Trustee will request that the Court enter an Order, in substantially the same form as Exhibit A attached to the Supplement as referenced above in subsection 7(d): (1) authorizing the Trustee to continue to conduct the Wind-down Operations (as defined in the Supplement); (2) setting a continued hearing for December 19, 2019 at 1:00 p.m.; and (3) granting such other and further relief as is just and appropriate under the circumstances.

8. Trustee's Motion to Approve Use of Cash Collateral (Motion for Use of Cash Collateral and Grant of Adequate Protection Related Thereto and Memorandum in Support Thereof) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 143]

Related Documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) 143 Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner, 144 Motion to Authorize filed by Lynn L. Tavenner, 145 Motion to Expedite Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 10/4/2019 at 01:30 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Beran, Paula) [ECF No. 146]
- b. Hearing held and continued; Motion Granted on Interim Basis; Order to be submitted (Re: related document(s) 143 Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner) Appearances: Paula S. Beran; Doug Foley; Robert Van Arsdale. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (oliverb) Modified on 10/4/2019 to correct related document. (Oliver, Betty). [ECF No. 148]
- c. First Interim Order (I) Authorizing Use of Prepetition Secured Lenders' Cash Collateral Pursuant to 11 USC sec. 361 and 363, and (II) Granting Adequate Protection and Related Relief to Prepetition Senior Secured Lenders.(Re: related document(s)143 Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner) (Bullock, Nathaniel) [ECF No. 151]

Response Deadline: October 22, 2019

Responses Filed: Objection to Trustees Motion for Use of Cash Collateral and Grant of Adequate Protection Related Thereto and Memorandum in Support [Dkt. No. 143] (Re: related document(s) [143] Motion to Approve Use of Cash Collateral filed by Lynn L. Tavenner) filed by Alexander Richard Green of Clark Hill PLC on behalf of iManage, LLC. (Attachments: # (1) Certificate of Service with Service List) (Green, Alexander) [ECF No. 170]

Status: This Trustee will request that the Court (1) authorize (a) the continued use of cash collateral, on an interim basis, for the benefit of the Estate consistent with the budget to be tendered at the hearing and (b) granting of certain adequate protection related thereto consistent with protections provided in the order referenced in subsections 8(c) above; and (2) continue the matter for final hearing at November 21, 2019 at 1:00 p.m.. In connection with the Objection of iManage, the Objection has been resolved in that the Trustee is seeking entry of a cash collateral order through November 21, 2019, with a corresponding budget, which budget contains \$35,000.00 payable in the second week of November for iManage's services during the budget period.

III. CONTESTED MATTERS

9. Amended Motion for Relief from Stay Re: Deposit Account Maintained by Debtor with Bank of America, N.A. with Notice of Hearing, (Related Document(s) 126 Motion for Relief from Stay filed by Bank of America, N.A.) filed by Michael D. Nord of Gebhardt & Smith LLP on behalf of Bank of America, N.A. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # 1 Exhibit(s) 1 # 2 Exhibit(s) 2 # 3 Exhibit(s) 3 # 4 Proposed Order # 5 Notice of Motion # 6 Service List as of September 17, 2019 # 7 Service List of 20 Largest Unsecured Creditors) (Nord, Michael) [ECF No. 158]

Related Documents:

- a. Motion for Relief from Stay Re: Deposit Account Maintained by Debtor with Bank of America, N.A. with Notice of Hearing, filed by Michael D. Nord of Gebhardt & Smith LLP on behalf of Bank of America, N.A. Hearing scheduled for 10/2/2019 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # 1 Exhibit(s) 1 # 2 Exhibit(s) 2 # 3 Exhibit(s) 3 # 4 Proposed Order # 5 Notice of Motion # 6 Service List (20 Largest Unsecured)) (Nord, Michael) [ECF No. 56]
- b. Amended Notice of Motion and Notice of Hearing (Re: related document(s) 56 Motion for Relief from Stay filed by Bank of America, N.A.) filed by Michael D. Nord of Gebhardt & Smith LLP on behalf of Bank of America, N.A. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # 1 Service List (20 Largest Unsecured)) (Nord, Michael) [ECF No. 60]
- c. Amended Motion for Relief from Stay Re: Deposit Account Maintained by Debtor with Bank of America, N.A. with Notice of Hearing, filed by Michael D. Nord of

Gebhardt & Smith LLP on behalf of Bank of America, N.A. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # 1 Exhibit(s) 1 # 2 Exhibit(s) 2 # 3 Exhibit(s) 3 # 4 Proposed Order # 5 Notice of Motion # 6 Service List as of September 17, 2019 # 7 Service List of 20 Largest Unsecured Creditors) (Nord, Michael) [ECF No. 126]

- d. U.S. Treasury receipt of Motion for Relief from Stay(19-34574-KRH) [motion, 185] (181.00) filing fee. Receipt number 31241003, amount \$ 181.00. (Re: Doc # 126) (U.S. Treasury) [ECF No. 127]
- e. Certificate of Service (Re: related document(s) 126 Motion for Relief from Stay filed by Bank of America, N.A.) filed by Michael D. Nord of Gebhardt & Smith LLP on behalf of Bank of America, N.A. (Attachments: # 1 Service List as of September 17, 2019 # 2 Service List of 20 Largest Unsecured Creditors) (Nord, Michael) [ECF No. 138]
- f. Certificate of Service (Re: related document(s) 158 Amended Motion for Relief from Stay filed by Bank of America, N.A.) filed by Michael D. Nord of Gebhardt & Smith LLP on behalf of Bank of America, N.A. (Attachments: # 1 Service List as of September 17, 2019 # 2 Service List of 20 Largest Unsecured Creditors) (Nord, Michael) [ECF No. 159]

Response Deadline: October 22, 2019

Responses Filed: Trustee's Response to Amended Motion for Relief from the Automatic Stay as to Bank of America, N.A. to Exercise Rights of Setoff with Respect to Deposit Account Maintained by LeClairRyan, PLLC with Bank of America, N.A. (Re: related document(s) [158] Amended Motion for Relief from Stay filed by Bank of America, N.A.) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 169].

Status: The Trustee will consent to the relief sought in the Motion subject to the terms contained in the Trustee's Response referenced above. To the extent the form of order has not been agreed to before the hearing, the Trustee will request that the Motion be continued to November 21, 2019, at 1:00 p.m., subject to the entry of a consent order before said hearing.

10. Motion for Relief from Stay Re: Motion of Michele Craddock for Limited Relief from the Automatic Stay with Notice of Hearing, filed by Michael Gregory Wilson of Michael Wilson PLC on behalf of Michele Craddock. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Attachments: # 1 Notice of Motion) (Wilson, Michael) [ECF No. 83]

Related documents:

- a. Supplemental Statement Supplemental Statement in Support of the Motion of Michele Craddock for Limited Relief from the Automatic Stay (Re: related document(s) 83 Motion for Relief from Stay filed by Michele Craddock) filed by Michael Gregory Wilson of Michael Wilson PLC on behalf of Michele Craddock. (Attachments: # 1 Exhibit(s) A (AAA Panel Award) # 2 Exhibit(s) B (Proposed Order)) (Wilson, Michael) [ECF No. 93]

Response Deadline: October 17, 2019

Responses Filed: Trustee's Response to (Trustee's Response and Limited Objection to Motion of Michele Craddock for Limited Relief from the Automatic Stay) (Re: related document(s) [83] Motion for Relief from Stay filed by Michele Craddock) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 171].

Status: The Trustee will consent to the relief sought in the Motion subject to the terms contained in the Trustee's Response referenced above. To the extent the form of order has not been agreed to before the hearing, the Trustee will request that the Motion be continued to November 21, 2019, at 1:00 p.m., subject to the entry of a consent order before said hearing.

11. Motion for Relief from Stay Re: Insurance Premiums and for Expedited Hearing filed by Kevin J. Funk of Durette, Arkema, Gerson & Gill PC on behalf of Bank Direct. (Attachments: # (1) Exhibit(s) A (Finance Agreement)) (Funk, Kevin) [ECF No. 162]

Related documents:

- a. Notice of Hearing (Re: related document(s) [162] Motion for Relief from Stay filed by Bank Direct) filed by Kevin J. Funk of Durette, Arkema, Gerson & Gill PC on behalf of Bank Direct. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Funk, Kevin) [ECF No. 164]

- b. Motion to Expedite Hearing (Related Document(s) [162] Motion for Relief from Stay filed by Bank Direct) filed by Kevin J. Funk of Durette, Arkema, Gerson & Gill PC on behalf of Bank Direct. (Attachments: # (1) Exhibit(s) A (Finance Agreement)) (Funk, Kevin) [ECF No. 167]
- c. Notice of Hearing (Re: related document(s) [167] Motion to Expedite Hearing filed by Bank Direct) filed by Kevin J. Funk of Durette, Arkema, Gerson & Gill PC on behalf of Bank Direct. Hearing scheduled for 10/24/2019 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Funk, Kevin) [ECF No. 168]

Response Deadline: October 23, 2019

Responses Filed: Trustee's Objection to BankDirect Capital Finance, LLC's Motion for Relief From the Automatic Stay and Motion for Expedited Hearing (Re: related document(s) [162] Motion for Relief from Stay filed by Bank Direct, [167] Motion to Expedite Hearing filed by Bank Direct) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. (Beran, Paula) [ECF No. 176]

Status: The Trustee and Movant have agreed that the Motion may be set for final hearing on November 21, 2019 at 1:00 p.m..

IV. UPDATES

12. Client Files

13. Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: October 24, 2019
Richmond, Virginia

By: /s/ David N. Tabakin
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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

CERTIFICATE OF SERVICE

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 24th day of October 2019, a true copy of the foregoing Amended Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ David N. Tabakin
Counsel for Lynn L. Tavenner, Chapter 7 Trustee